Atty. Docket No. YO-999-599
(590.005)

REMARKS

Applicants and the undersigned are most grateful for the time and effort accorded

the instant application by the Examiner. The Office is respectfully requested to

reconsider the rejections presented in the outstanding Office Action in light of the

following remarks.

Claims 1-19 were pending in the instant application at the time of the outstanding

Office Action. Of these claims, Claims 1, 10, and 19 are independent claims; the

remaining claims are dependent claims. Claims 1, 2, 5-11 and 14-19 stand rejected 35

U.S.C. § 103(a) in view of Brandow et al. (hereafter "Brandow") in view of Ellozy et al.

(hereafter "Ellozy"). The Office has admitted that not one of these references describe

the present invention, but claims that combination of the teachings of these references

would be obvious to a person skilled in the art. This is not supported by the references.

Reconsideration and withdrawal of the present rejections are hereby respectfully

requested.

The present invention broadly contemplates a system and method that is based on

an application of a statistical translation model (trained from a parallel or comparable

corpus) to feature regularization for audio indexing. (Page 4, lines 5-7) The statistical

machine translation model improves the quality of text features used to create the audio

indexing database. The text data, created by a speech recognizer and/or feature extraction

arrangement, is processed by the statistical translation model, trained on a parallel sets of

automatically and by-hand transcribed data. (Page 4, lines 7-10) The present invention

- 8 -

may be used in can be used not only in audio indexing, but also in any application where
noisy text data is processed, such as: in indexing hand-writing recognition corpus, in
indexing scanned (OCR processed) documents, and in indexing sources corrupted by
typing errors, as is the case of many Internet sources. (Page 10, line 16 - Page 11, line 4)

As best understood, Brandow appears to be directed to improving the accuracy of
speech recognition through linguistic post-processing. (Col. 1, lines 17-18) Text data
generated from a speech recognition system is collected along with a corresponding true
transcription of the speech recognition speech text data. (Col. 1, lines 55-57) The text
data generated from the speech recognition system is then aligned with the corresponding
true transcription of text data. (Col. 1, lines 57-59) Thus, Brandow appears to propose
processing text to improve readability for a human user, which is different than the
present invention.

The combination of Brandow and Ellozy does not overcome the deficiencies of
Brandow set forth above. In that regard, the combination of Brandow and Ellozy would
produce an arrangement in which a speech recognizer produces words, the words are
corrected, and then the corrected words are converted to indexer features. Combining
Brandow and Ellozy does not result in the present invention.

The instantly claimed invention requires specifically that "said textual input
appears as a feature-extracted transformation". (Claim 1) Similar language appears in
the other independent claims. Utilizing a "feature-extracted transformation" prior to
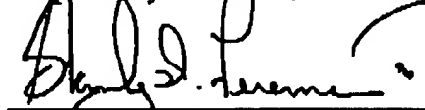reconfiguration is simply not taught or suggested by either Brandow and Ellozy.

- 9 -

By virtue of dependence from what are believed to be allowable independent

Claims 1, 10, and 19, it is respectfully submitted that Claims 2-9 and 11-18 are also

presently allowable. Applicants acknowledges that Claims 304 and 12-13 were indicated

by the Examiner as being allowable if rewritten in independent form. Applicants reserve

the right to file new claims of such scope at a later date that would still, at that point,

presumably be allowable.

The "prior art made of record" has been reviewed. Applicants acknowledge that

such prior art was not deemed by the Office to be sufficiently relevant as to have been

applied against the claims of the instant application. To the extent that the Office may

apply such prior art against the claims in the future, Applicants will be fully prepared to

respond thereto.

In summary, it is respectfully submitted that the instant application, including

Claims 1-19, is presently in condition for allowance. Notice to the effect is hereby

earnestly solicited. If there are any further issues in this application, the Examiner is

invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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- 10 -